

EXHIBIT B

Thursday, June 1, 2023 at 14:16:35 Central Daylight Time

Subject: Re: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence
Date: Wednesday, May 31, 2023 at 5:01:06 PM Central Daylight Time
From: Trey Branham
To: Wall, Katie L.
CC: Rasmussen, Mark W., Torborg, David S., Villari, Timothy M., Gordon, Gregory M., Jessica Dean, Brad Smith, Danielle Hong

The motion specifically says that you are foregoing a memorandum of law. There is no authority cited at all.

Charles W. Branham, III | Partner

O: (214) 722-5990 | C: (214) 478-0972

www.dobslegal.com

From: Wall, Katie L. <klwall@jonesday.com>
Date: Wednesday, May 31, 2023 at 5:00 PM
To: Trey Branham <tbranham@dobslegal.com>
Cc: Rasmussen, Mark W. <mrasmussen@jonesday.com>, Torborg, David S. <dstorborg@JonesDay.com>, Villari, Timothy M. <tvillari@jonesday.com>, Gordon, Gregory M. <gmgordon@JonesDay.com>, Jessica Dean <jdean@dobslegal.com>, Brad Smith <bsmith@dobslegal.com>, Danielle Hong <dhong@dobslegal.com>
Subject: RE: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Trey,

We served subpoenas for documents and moved on the subpoenas. The Debtor's legal basis is provided in the Motion and Debtor's requests.

Thank you,

Katie Lyons Wall ([bio](#))

Partner

JONES DAY® - One Firm Worldwide™

2727 N. Harwood Street

Dallas, Texas 75201

Office +1.214.969.4576

Mobile +1.972.489.8779

From: Jessica Dean <jdean@dobslegal.com>
Sent: Wednesday, May 31, 2023 3:24 PM
To: Trey Branham <tbranham@dobslegal.com>; Wall, Katie L. <klwall@jonesday.com>; Brad Smith <bsmith@dobslegal.com>; Danielle Hong <dhong@dobslegal.com>
Cc: Rasmussen, Mark W. <mrasmussen@jonesday.com>; Torborg, David S. <dstorborg@JonesDay.com>; Villari, Timothy M. <tvillari@jonesday.com>; Gordon, Gregory M. <gmgordon@JonesDay.com>
Subject: Re: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

Adding in Mr. Gordon in event he wants to be on the correspondence.

Jessica Dean

O: (214) 722-5994 | C: (214) 476-5210

302 N Market St, Suite 300
Dallas, TX 75202

www.dobslegal.com

Dean Omar Branham Shirley, LLP

From: Trey Branham <tbranham@dobslegal.com>
Date: Wednesday, May 31, 2023 at 2:48 PM
To: Wall, Katie L. <klwall@jonesday.com>, Jessica Dean <jdean@dobslegal.com>, Brad Smith <bsmith@dobslegal.com>, Danielle Hong <dhong@dobslegal.com>
Cc: Rasmussen, Mark W. <mrasmussen@jonesday.com>, Torborg, David S. <dstorborg@JonesDay.com>, Villari, Timothy M. <tvillari@jonesday.com>
Subject: Re: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

Katie-

I got your motion to compel. I was very surprised given our specific request that you provide us with the authority you rely on to demand discovery from my law firm about my clients. In your motion to compel, you ask to waive the memorandum of law. We intend to file an objection to that request and insist that you explain yourself to the court and to us the basis of the authority you rely on for your request.

What is Jones Day's position on the authority? Additionally, do you agree that that authority, such as it is, makes discovery against Jones Day proper?

Thanks very much in advance for your prompt response.

Best,

Trey

Charles W. Branham, III | Partner

O: (214) 722-5990 | C: (214) 478-0972

www.dobslegal.com

From: Wall, Katie L. <klwall@jonesday.com>

Date: Thursday, May 25, 2023 at 3:21 AM

To: Jessica Dean <jdean@dotslegal.com>, Trey Branham <tbranham@dotslegal.com>, Brad Smith <bsmith@dotslegal.com>, Danielle Hong <dhong@dotslegal.com>

Cc: Rasmussen, Mark W. <mrasmussen@jonesday.com>, Torborg, David S. <dstorborg@JonesDay.com>, Villari, Timothy M. <tvillari@jonesday.com>

Subject: FW: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel---

I am following up on the Debtor's deficiency letter regarding your discovery responses. To streamline this process, the Debtor proposes that Dean Omar provide the following outstanding information and/or document requests, and the Debtor will not pursue the remaining deficiencies in your responses in connection with the motion to dismiss.

1. Identify or produce documents sufficient to identify the total number of unfiled Talc Claims.
2. Identify and produce any settlement demands and/or settlement offers, written or oral, that your firm has made with respect to any individual or group of Talc Claims from January 1, 2019 through present.
3. Documents and Communications between your firm and any law firm or claimant concerning the proposed Plan Support Agreement or the Proposed \$8.9 billion Settlement.

This proposal does not prejudice the Debtor's rights to pursue its remaining discovery requests in connection with other aspects of this case.

Please let us know if you agree to this proposal.

Thanks,

Katie Lyons Wall ([bio](#))

Partner

JONES DAY® - One Firm Worldwide™

2727 N. Harwood Street

Dallas, Texas 75201

Office [+1.214.969.4576](tel:+12149694576)

Mobile [+1.972.489.8779](tel:+19724898779)

From: Jessica Dean <jidean@dobslegal.com>

Sent: Monday, May 22, 2023 12:40 PM

To: Villari, Timothy M. <tvillari@jonesday.com>; Trey Branham <tbranham@dobslegal.com>; Brad Smith <bsmith@dobslegal.com>; Danielle Hong <dhong@dobslegal.com>

Cc: Gordon, Gregory M. <gmgordon@JonesDay.com>; Prieto, Dan B. <dbprieto@JonesDay.com>; Rasmussen, Mark W. <mrasmussen@jonesday.com>; Jones, James M. <jmjones@JonesDay.com>; Gottbrecht, Geoffrey N. <ggottbrecht@jonesday.com>; Erens, Brad B. <bberens@JonesDay.com>; Wall, Katie L. <klwall@jonesday.com>

Subject: Re: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

Tim,

This is second request to include my co-counsel on request to our firm. Please take note. I will repeat the failure to do so should be considered a failure to communicate at all. I will forward the e-mail below to the identified people on my team. I have been in five trials in the last year discussing the talc your client to this day claims have no asbestos in it. As a result of this and other scheduling issues I am often in the weeds with other matters for days and it is critical that you take this relatively simple step.

I hope you understand the frustration.

Thanks,

Jessica Dean

O: (214) 722-5994 | C: (214) 476-5210

302 N Market St, Suite 300
Dallas, TX 75202

www.dobslegal.com

Dean Omar Branham Shirley, LLP

From: Villari, Timothy M. <tvillari@jonesday.com>

Date: Monday, May 22, 2023 at 11:47 AM

To: Jessica Dean <jidean@dobslegal.com>

Cc: Gordon, Gregory M. <gmgordon@JonesDay.com>; Prieto, Dan B. <dbprieto@JonesDay.com>; Rasmussen, Mark W. <mrasmussen@jonesday.com>; Jones, James M. <jmjones@JonesDay.com>; Gottbrecht, Geoffrey N. <ggottbrecht@jonesday.com>; Erens, Brad B. <bberens@JonesDay.com>; Wall, Katie L. <klwall@jonesday.com>

Subject: In re LTL Management LLC, Case No. 23-12825 (MBK), Discovery Correspondence

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel,

Please find the attached correspondence and let the Debtor know when you are available for a meet and confer.

Timothy M. Villari
Associate
JONES DAY® - One Firm Worldwide®
2727 N. Harwood St.
Dallas, Texas 75201
Office +1.214.969.5104

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.

This e-mail (including any attachments) may contain information that is private, confidential, or protected by attorney-client or other privilege. If you received this e-mail in error, please delete it from your system without copying it and notify sender by reply e-mail, so that our records can be corrected.